

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION**

MOTIVA PATENTS, LLC,

Plaintiff,

v.

SONY CORPORATION ET AL.,

Defendants.

CIVIL ACTION NO. 9:18-cv-00180-JRG-KFG

JURY TRIAL DEMANDED

NOTICE OF VOLUNTARY DISMISSAL UNDER FED. R. CIV. P. 41(a)(1)(A)(i)

Motiva Patents LLC hereby voluntarily dismisses its action against HTC Corporation, without prejudice, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i). HTC Corporation has not yet served an answer or a motion for summary judgment.¹

Dated: October 6, 2019

Respectfully submitted,

/s/ Matthew J. Antonelli

Matthew J. Antonelli

Texas Bar No. 24068432

matt@ahtlawfirm.com

Zachariah S. Harrington

Texas Bar No. 24057886

zac@ahtlawfirm.com

Larry D. Thompson, Jr.

Texas Bar No. 24051428

larry@ahtlawfirm.com

Michael D. Ellis

Texas Bar No. 24081586

michael@ahtlawfirm.com

Christopher Ryan Pinckney

¹ Motiva Patents has decided to dismiss this action because on Friday, October 4, 2019 (one business day before the close of discovery and during the parties' mediation) HTC Corporation raised for the first time an issue of Article III standing, taking the position that the assignment of the patents-in-suit to Motiva Patents is void. Motiva Patents does not agree with HTC's position. But rather than proceeding with that cloud over Motiva Patents' title to the patents-in-suit, Motiva Patents has decided to moot HTC's argument by having a new assignment executed and will re-file this action.

Texas Bar No. 24067819
ryan@ahtlawfirm.com
ANTONELLI, HARRINGTON
& THOMPSON LLP
4306 Yoakum Blvd., Ste. 450
Houston, TX 77006
(713) 581-3000

Stafford Davis
State Bar No. 24054605
sdavis@stafforddavisfirm.com
Catherine Susan Bartles
Texas Bar No. 24104849
cbartles@stafforddavisfirm.com
THE STAFFORD DAVIS FIRM, PC
The People's Petroleum Building
102 N College Ave., 13th Floor
Tyler, Texas 75702
(903) 593-7000

Attorneys for Motiva Patents, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of October 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Matthew J. Antonelli

Matthew J. Antonelli